

**Council's Reference: PR.2021.1029**

14 July 2021

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**Submission State Significant Development - (SSD-10326042).  
Lot 3 DP 1179941, 241 Gorman Drive GOOGONG NSW 2620**

Dear Sir/Madam

Reference is made to the proposed Education Establishment lodged as a State Significant Development in accordance with *State Environmental Planning Policy (State and Regional Development) 2011 – Schedule 1 – Item 15 Educational Establishments*.

Thank you for the opportunity to make a submission on the development. Council has reviewed the documentation and provides detailed feedback within this submission as well as recommended conditions to be imposed on any consent. The submission below is structured as follows:

1. Engineering Comments
  2. Planning Comments
  3. Building Comments
  4. Health Advice
- Appendix 1 - Recommended Conditions of Consent

## **1. Engineering Comments**

### *1.1. Consultation/General*

Council has been involved in consultation on the proposed Primary School Site since late 2020. During these discussions the issue of the of the roads around the site not complying with Council's current design specifications was raised as was the frequent safety issues within these areas. The analysis of the existing road network does not adequately consider the existing road geometry or the intersections around the adjacent shopping centre.

Throughout consultation Council has provided data from existing schools within Queanbeyan supporting Council feedback which does not appear to have been considered in the current proposal. The submitted traffic design solutions proposed are based on newly constructed schools or suburban Sydney schools without justification linking them to the subject site. Council considers that the use of urban city data as opposed to regional local data is inappropriate in this instance. As such it is concluded that the data provided in the submission may need to be re-visited prior to a determination of this application.

Council remains concerned that during construction and following opening, it will be the likely party that will be responsible to undertake implementation of pedestrian crossings proposed. Council's Road Safety Officer will be required to implement proposed measures included in the EIS and the current design does not appear achievable regarding ongoing management.

Council has recommended an number of deferred commencement conditions and remains hopeful of engaging with the Department to achieve the best solution to achieve productive and safe outcomes for the community.

## *1.2. Traffic Impact Assessment*

As previously mentioned, Council raises concern on the data utilised in the Traffic Impact Assessment given it is not targeted to the regional locality.

### *1.2.1. Existing Network*

The information extracted from the traffic assessment showing the highlighted roads including Aprasia Avenue are incorrect as they are not constructed as Collector Roads with respect to geometric road design or pavement design. This is particularly evident by the significant road width characteristics of these roads in comparison with other highlighted collector roads. These roads and Aprasia Avenue have been problematic and hazardous roads for Council. The Traffic Impact Assessment in responding to the SEARs requirement 5.1 has not satisfied this aspect of the existing Road Network and Hierarchy.

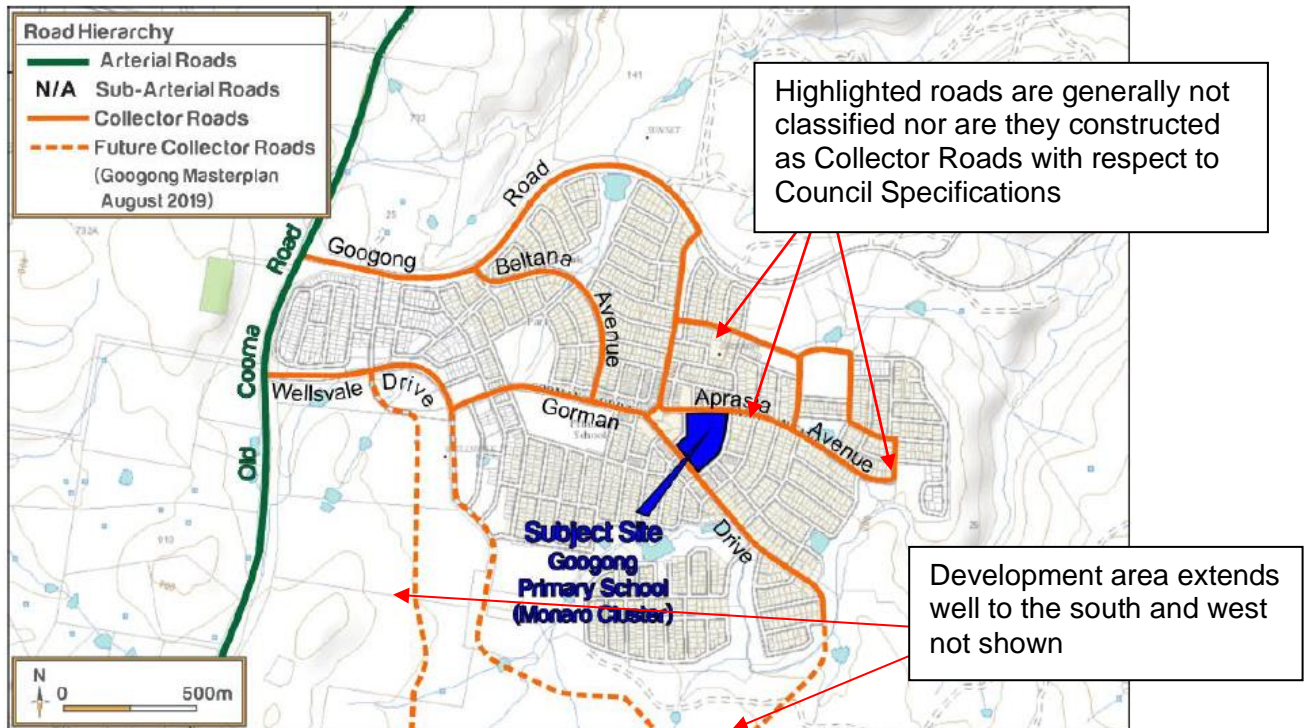


Figure 6: Road Hierarchy

For this reason Aprasia Avenue is not considered a suitable road for pick up and drop off facilities due to problems associated with the narrow width. No intersection swept path analyses have been provided to support the application for any of the intersections directly surrounding the school site. The assessment does not appear to consider the road widths of Wilkins Way and McPhails Way along with the Caragh/Aprasia and Gorman/Caragh intersections.

#### 1.2.2. Travel Modes

The EIS and supporting Traffic Assessment places significant emphasis on active transport. It is agreed that the pedestrian and cycle path network within Googong is of a higher standard than older suburbs with the LGA. Googong is a well marketed “active community”. Higher levels of cycle path usage in Googong are evident however, its geographical location in relation to the main employment centres in the region make active transport challenging. Data was provided during the consultation meetings supporting this information which demonstrated the difference between the nominated Estella Public School and the proposed Googong School demographic. This data is summarised below:

- 96% of Googong residents travel to work by car;
- Observations of the Googong Child Care Centre showed less than 5% (only 1-2 parents) dropped children off by walking during the pleasant weather of November last year;
- During the height of COVID related restrictions, schools such as Jerrabomberra Public had no increase in active transport rates, rather peak drop off/pick up peak

periods increased and shortened in duration due to parents dropping off/picking up closer to the “bell time”;

- Council’s online surveys (108 Googong residents responded) detailed that two of the primary difficulties in promoting active transport in the region are climatic and economic. During winter 25% of respondents said that they would not use walking/cycling due to weather considerations;
- 63% of respondents in Council’s survey commute to the ACT for employment and do not utilise the pedestrian cycle paths;
- 86% of respondents to Council’s survey comprised either one full time parent and one part time parent or two full time working parents. 50% of respondents were two full time working parents who stated personal vehicle travel mode is the most convenient, economic and timely mode of transport.

Whilst Council supports and promotes active transport, the infrastructure that supports travel to the proposed school needs to have sufficient redundancy to deal with low participation in active transport to avoid failure.

In summary, Council’s view of the mode share, is that 80% vehicle usage mode would likely be a middle case not the worse case as suggested. It is concluded that the modes adopted in the Traffic Assessment are not realistic and as such concern is raised that the assessment of the locality has not been undertaken to consider the above data.

#### *1.2.3. Analysis Assumptions & Methods*

During consultation it was agreed that Jerrabomberra School was a similar geographical centre, with similar community however, it does not appear that this data was utilised to calculate trip generation. The use of a reduction factor on the presented data for Out of School Hours (OOSH) Care does not seem appropriate. Applying a reduction factor effectively is factoring OOSH a second time. As a result the assumptions underestimate the trip generation.

The future Traffic Analysis appears to be primarily based on current survey data collected without consideration of the impacts on traffic when the Wellsvale and Gorman Drives loop is opened providing access to further residential development to the south and west. Googong Township is expected to grow from approximately 3500 dwellings currently to 6200 in its final state. Yet, a 2% annual growth factor has seemingly been adopted. Below is an extract from Section 2.1.1 of the same Traffic Assessment that indicates starkly different growth data;

*The data indicates that the Estimated Resident Population (ERP) in 2020 was 5,677 which was an increase of approximately 16.95% from the previous year. Figure 4 presents the data from 2013 to 2020 to highlight the growth trend over seven years.*

This assumption represents a shortcoming in the analysis of the traffic generation and transport performance around the school and needs to be revised.

### 1.3. Access/Pedestrian Crossings

The number of access points and pedestrian crossings along with locations of crossings adjacent to intersections are not supported. Council's position on this is echoed in feedback provided by TfNSW, extracts below;

*e) Assess and justify the number of access points required to and from the school. TfNSW notes that the concept site plan (Figure 2.1 in the GHD report) shows five pedestrian access points to the school. TfNSW would encourage limiting the number of access points to three (e.g. one on each frontage except McPhail Way). An initial review has indicated that as there is a pedestrian and vehicle generator on McPhail Way with the shops and car parking. An entrance on this side could cause safety concerns as well as increased congestion. TfNSW also suggests that the main entrance to the school be provided via Wilkins Way and not Gorman Drive. This is due to crossings and main entries being avoided on sub arterial roads or roads with greater than 2,000 annual average daily traffic (AADT);*

*f) Reduce/consolidate the number of children's crossings. TfNSW notes that the concept/site plan provided shows 6 crossings. Any crossing provided should be strategically located to be safe and accommodate desire lines. Where possible raised zebra crossing shall be used with no crossings installed at junctions. Details are also required on how the crossings proposed meet the numerical warrants detailed in the TfNSW Supplement Austroads Guide to Traffic Management Part 6;*

The rationale of having multiple entrances for the school site to promote pedestrian access, is a principle Council supports. However, in practice existing schools within the area that have two entrances have seen principals typically opt to close one entrance in favour of managing one single entrance to the school. Council encourages reconsideration of a main access on Gorman Drive. The nearby Anglican School whilst fronting Gorman Drive has their access aligned with the off-street parking and pick up/drop off area on Rosa Street. Similarly, Queanbeyan East Public School have closed their access via Yass Road and have their main access points on minor local roads like Thurrallilly and Mulloon Streets.

Given the above it is Council's view that the number of access points should be minimised.

Respondents to Council's online survey added safety of supervised children's crossings would encourage active transport options along with controls to regulate speeding vehicles. It is envisaged that TfNSW will be unable to staff the number of crossings proposed.

#### *1.4. Drop off/Pick Up Area*

Council acknowledges the current proposal requires widening of the parking bays on Aprasia Avenue. One of the dangerous traffic movements and unwanted behaviours in school zones is U-Turning. The Kiss and Drop facilities as proposed are easily navigated by residents to the east. However, residents living to west/north of Caragh Avenue and south/west of Gorman Drive do not have a clear access path to Aprasia Avenue facilities, especially if congestion with pedestrian crossings is experienced.

Several local roads may experience unintended school zone traffic (Daniel Street, Griffiths Link and Aitken Street) but Aprasia Avenue may also experience illegal U-turning. Parents will also inevitably end up dropping off in McPhail Way as well which, if no controlled pedestrian crossing facilities are provided, will lead to pedestrian conflict issues.

The proposal has provision for 21 drop off/pick up spaces, which appears significant though when details of the proposal are interrogated Council staff believe this number to be insufficient.

Firstly, six of these spaces are located on Gorman Drive, which are proposed to service the Special Education Portion of the school which is likely to be a smaller student population that likely need longer times for this operation. Council staff do not consider this to be “best design practice” creating a conflict with passenger vehicles attempting to pull in and potential queuing adjacent to buses attempting to leave. Council would further suggest this area be analysed separately to the overall drop off/pick up capacity.

Secondly, one of the fifteen spaces on Aprasia Avenue is a singular bay, located on the western side of the car park driveway, which is not practical and should be excluded as it's more likely to cause confusion than benefit.

This leaves 14 spaces, which is approximately the same as the nearby Anglican School. Observations in March (a more favourable time of year for active transport) this year of the function of that school's drop off/pick up area indicated that the area worked relatively well during the am drop off, with 120 drop offs over a 30 minute period with queuing confined to the off street car park. While less vehicles (96) were observed during the pm pickup, significant queuing inside and out of the car park onto Rosa Street was encountered. In comparison, the 473 quoted vehicle capacity of the proposal with similar parking capacity, no queuing capacity and at least double the student population of the Anglican School seems highly inaccurate. Council staff believe the capacity of the facilities have been significantly over estimated, the basis for the calculations are not on real world observations and significant impacts to the local streets are expected as a result.

*Alternatives to the Aprasia Avenue Drop off Zone* - Council's position has been for the drop off/pick up zone to be located in a single area ideally constructed as an indented bay on Wilkins Way separated from other traffic generating development. This is supported in the feedback from TfNSW;

- h) TfNSW suggests that Wilkins Way should be indented and should be the preferred drop and pickup for parents...*

As a secondary preference Council would like to see the drop off/pick up area incorporated into the proposed off-street car park off Aprasia Avenue. Section 9.2.4 of the Traffic Assessment misrepresents Council's secondary preference by analysing an off-street drop off/pick up area separate to the proposed car park.

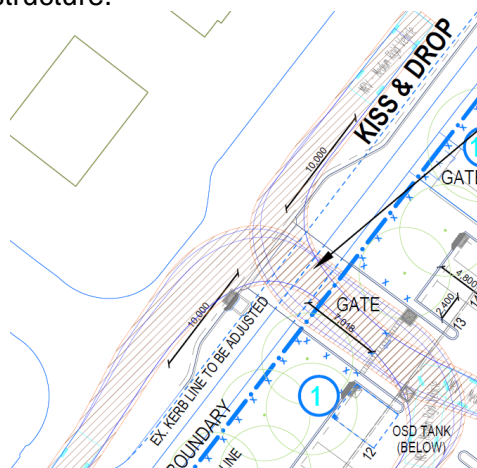
Council staff do not consider Aprasia Avenue to be conducive to a safe drop off/pick up area and these alternatives present the best outcomes in terms of user safety and traffic generation.

### 1.5. Bus Bays

There is an improvement on the previous plan observed however, Council strongly urges the entire Gorman Drive frontage be used for buses as opposed to a portion as proposed. The Anglican School with a significantly lower student population than proposed currently sees 3-4 buses arriving at the same time, to which Council has extended the existing bus bay to accommodate the buses from queuing on Gorman Drive. This is a common practice at many of our schools and should be expected and catered for by utilising the entire Gorman Drive frontage. It is noted initial designs had the special education needs parking indented on Wilkins Way which would allow Gorman Drive to be used for buses.

### 1.6. Car Park Driveway

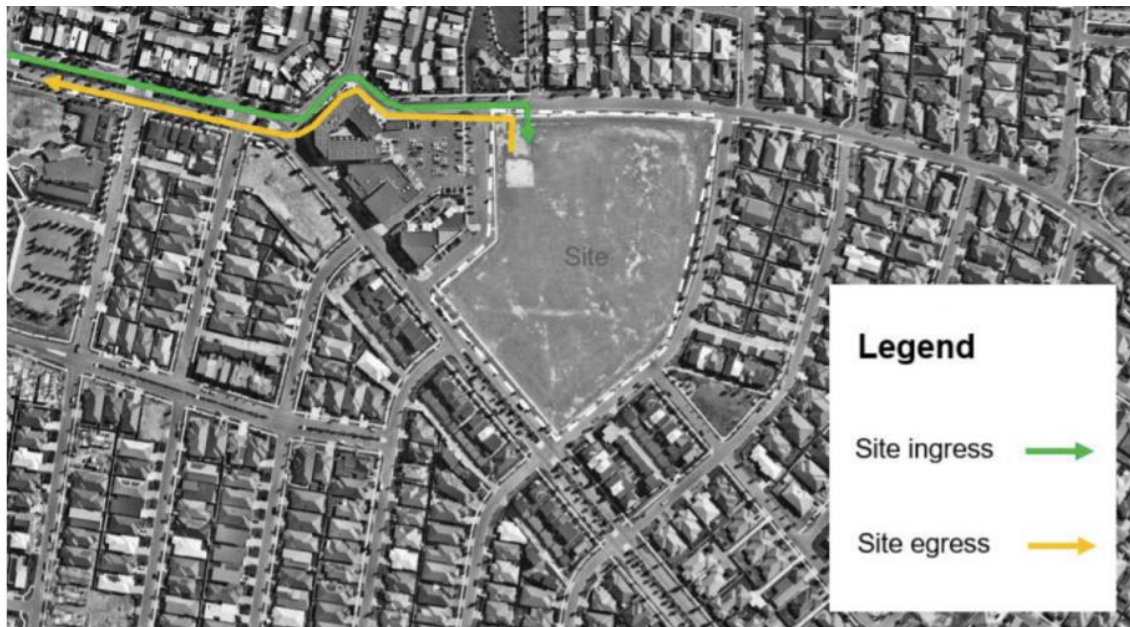
The following figure has been extracted from the information provided. It shows that the driveway for the proposed waste vehicle swept path is not wide enough to cater for its entry and exit. The vehicle crossing should be widened or location adjusted to prevent damage to Council infrastructure.





### 1.7. Construction Traffic

Access to the site via Caragh Avenue and Aprasia Avenue is not considered suitable for heavy vehicles. The site has an existing vehicle crossing on Gorman Drive and heavy vehicles should utilise this entrance. It is also noted that there is no mandate to ensure on-site parking is provided during construction. As on street parking around the site is well utilised, parking must be provided on site to avoid adverse impacts to neighbouring developments.



**Figure 7-15** Construction vehicle haulage routes

Source: Ason Group

## 2. Planning Comments

### 2.1. Height

While it is noted that the height of the development is not required to be adhered to under the *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017 Clause 42* it does exceed Council's height limits for this area of Googong. The EIS details reasoning for this variation and is summarised as:

- It is argued it complies with the objectives of the clause given that it:
  - *Complements the streetscape by providing two-storey built form that is compatible with the surrounding two-storey residential development and the neighbouring three-storey shop top housing.*
  - *Does not adversely affect any heritage item (there are no heritage items in the vicinity).*
  - *Provides for an appropriate transition in building height between the higher intensity commercial development to the west and the surrounding lower intensity residential development.*



*Compliance with the standard is also unreasonable and unnecessary because the existing 8.5m height standard does not clearly support the height control's objective of providing an appropriate transition between uses. As shown in Figure 5-2, the 12m height zone does not transition smoothly to the east away from the village centre. Instead, the 12m zone effectively wraps around the subject site, leaving the site as an anomalous 8.5m zone surrounded by a 12m zone to the north, west, south and partially to the east.*

*It is not evident, therefore, that strict compliance with the height standard would result in a better outcome in terms of height transition. In fact, the proposal's minor contravention of the height standard would arguably provide for a better height transition by allowing for a smoother height progression from the 12m zone at the village centre down to the 8.5m zone to the east/northeast of the site.*

**Council Comments** - When considering height variations, Council must ensure the public interest is protected under *Part 4.15* of the *Environmental Planning and Assessment Act 1979*. It is agreed the design of the building meets the objectives of the Clause and will not be an obtrusion into the streetscape. Concerns surrounding height variations generally relate to overshadowing and privacy impacts upon residents. Existing school developments have shown that privacy is a major concern for residents, and this should be mitigated as best as possible with privacy measures.

The EIS states blocks A, B and C all include this variation. These blocks adjoin:

- Block C – McPhail Way – No clear privacy impacts.
- Block A and B – Gorman Drive – Minor privacy impacts envisaged to units along Gorman Drive – Recommend windows on this side for second storey include privacy treatments to avoid direct overlooking into front windows of residences.
- Block B - Wilkins Way - Minor privacy impacts envisaged to units along 261 Gorman Drive and 4 and 2 Wilkins Way – Recommend windows on this side for second storey include privacy treatments to avoid direct overlooking into front windows of residences.

Overall the privacy impacts are minor; however, from previous applications present major concerns for residents. Therefore it is recommended all second storey windows include some form of privacy treatment (obscure glazing) where they adjoin residential properties. Generally, this would be measured from the proposed finished floor level to a height of 1.7 metres. Highlight windows are also a good alternative to mitigate privacy impacts.

## **2.2. Acoustic Concerns**

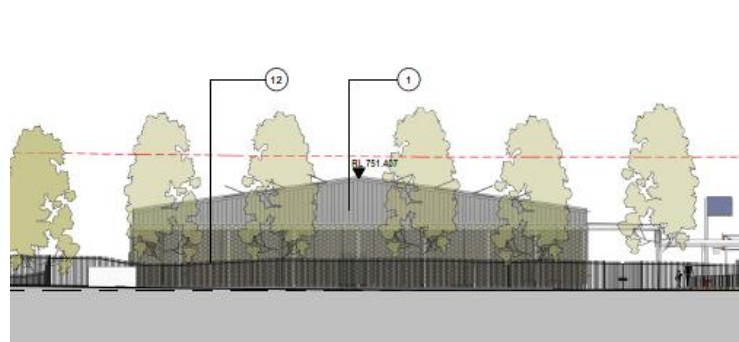
The acoustic report has considered current and future noise impacts. It is supported that materials be considered for the school specifically adjoining Gorman Drive and Aprasia Avenue that include acoustic treatments. Googong is a high growth subdivision and these roads are likely to become heavily impacted by traffic in the future which could create disturbance to learning areas.

### 2.3. Elevation

Principal 7 within the *State Environmental Planning Policy (Educational Establishments and Child Care Facilities) 2017* states:

*School buildings and their landscape setting should be aesthetically pleasing by achieving a built form that has good proportions and a balanced composition of elements. Schools should respond to positive elements from the site and surrounding neighbourhood and have a positive impact on the quality and character of a neighbourhood.*

The elevation at the northern end of McPhail Way has a façade that presents a blank wall that could be improved with windows, articulation or change of materials. Landscaping shown on the elevation will soften this portion however, this is not a permanent fix and it is recommended some small changes be made to this building elevation to improve this façade.



**Figure 1: McPhail Way Elevation – Northern End**

### 2.4. Heritage

It is recommended a condition be imposed on the consent requiring that if any items or artefacts are discovered during construction all works stop immediately and Heritage New South Wales contacted.

### 2.5. General Comments

- Sustainable design concepts : orientation, shading of buildings, energy efficiency principles (remove gas heating/cooking), location for kitchen gardens, composting to be incorporated into design
- Space/Activity Management - space between Blocks A, B and C (3WC's) located in the most desirable play space area on cold wintery days. These WC's to be relocated or better integrated into main blocks.
- Core principles of CPTED to be incorporated - crime prevention through environmental design - safer by design evaluation required.
- Landscaping – native plant selection from local region.
- Details of waste pad are too small. Waste area to be relocated to an area that is fenced to allow truck movements for pick up. Consideration should be given to recycling and composting.

- Please ensure you have consulted with Googong Township on the design of the school in regard to colours and materials. Googong Township has a schedule of design guidelines to ensure consistency in the streetscape.
- No signage plans were provided in the documentation. A condition is recommended to prevent any obtrusive lighting mechanisms and glare to pedestrians, vehicles and cyclists. It is highly recommended illuminated signs do not face into residential properties.
- There is a lack of facilitation for disabled access noting it appears there is only one lift to the second storey of the building and stairs to the play areas. It is recommended this be revised.

### **3. Building Comments**

The proposed school development is considered a two storey class 9b building requiring a minimum of type B construction under the BCA 2019. The proposal addresses accessibility provisions but a full BCA compliance report has not been provided. No objection is raised to the proposal.

### **4. Health Advice**

- Consideration should be given to screening of entry doors to toilet blocks for student privacy
- Canteen fit out to comply with *AS4674- 2004- Design Construction and Fit Out of Food Premises*

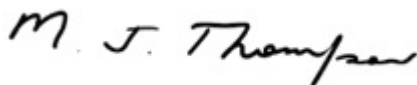
### **5. Conclusion**

Overall, Council raises no objections to the site being utilised for a primary school and supports the ongoing education of the community and employment opportunities.

However, Council's support for the proposal is subject to the adoption of the attached recommended conditions of consent and in particular the resolution of the Engineering impacts. If these conditions are not imposed and Engineering issues not resolved Council cannot support the development.

Should you have any questions please contact Kaycee Dixon-Hilder of Council's Environment, Planning and Development Section on 1300 735 025.

Yours faithfully



**M J Thompson**  
Acting CEO

## APPENDIX 1

### Recommended Conditions of Consent

#### **Deferred Commencement Conditions**

##### **~ Traffic Impact Assessment**

The traffic Impact assessment report is to be revised incorporating

- Traffic projections that are reflective of the final Googong Township development,
- Mode share data from existing schools within Queanbeyan,
- Traffic generation data from existing schools within Queanbeyan
- Analysis of surrounding intersections including swept vehicle paths.

*Reason: To ensure accuracy within Traffic Impact Assessments.*

##### **~ Pedestrian Crossings & Access Points**

Pedestrian Crossings and Access points to the school are to be reduced in number and refined in accordance with Traffic for New South Wales (TfNSW) advice dated 11 November 2020.

*Reason: To ensure compliance with Traffic for New South Wales requirements.*

##### **~ Drop off/Pick Up Area**

The drop off / pickup area in Aprasia Avenue is to be amended in accordance with Council and TfNSW advice dated 11 November 2020 by construction of indented bays along Wilkins Way.

*Reason: To ensure compliance with Traffic for New South Wales requirements.*

##### **Bus Bays**

The design is to be amended such that the frontage of Gorman Drive shall only be used as a bus bay area with the exception of any pedestrian crossing that may be warranted.

*Reason: To ensure safety for the students accessing the school and the community of Googong.*

#### **Conditions to be Complied with Prior Commencement of Works**

##### **~ Section 138 Consent & Traffic Management**

Prior to undertaking any works within a public road reserve or affecting the road reserve, a traffic management plan is to be submitted to and approved by Council.

*Reason: To ensure that works carried out comply with the Roads Act.*

##### **~ Car Park**

The car park is to be amended such that waste vehicles are able to pick up waste without carriage through parking spaces and the driveway is to be widened sufficiently that the check vehicle is able to enter and exit without tracking the kerb and verge.

*Reason: To ensure the car park can be used and manoeuvred by all required vehicles.*

## **General Conditions**

### **~ Construction Management**

All vehicles associated with the construction of the development are to park on-site. Access and egress of heavy vehicles is to be via the existing vehicle crossing on Gorman Drive.

*Reason: To ensure that works carried out comply with the Roads Act.*

### **~ Privacy Treatments**

Permanent privacy measures are to be imposed to all second storey windows facing onto dwellings along Gorman Drive and Wilkins Way. Measures are to be a height of 1.7 metres above the adjacent finished floor level.

*Reason: To ensure direct overlooking into residential dwellings is not possible.*

### **~ Acoustic Treatments**

Acoustic treatments are to be imposed onto windows and building materials specifically adjoining Aprasia Avenue and Gorman Drive as per recommendations within the Acoustic Report prepared by Pulse White Noise Acoustics Pty Ltd detailed on pages 34 – 37.

*Reason: To ensure acoustic impacts are mitigated to future users of the site.*

### **~ Unexpected Finds**

The development is to proceed with caution. If any Aboriginal objects are found, works should stop and DECCW notified. If human remains are found work is to stop, the site is to be secured and the NSW Police and NSW Office of Environment and Heritage are to be notified.

*Reason: To ensure objects discovered during construction are protected and notified in accordance with the Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales.*

### **~ Comply with the Building Code of Australia**

All work is to comply with the current edition of the Building Code of Australia.

*Reason: All building work is carried out in accordance with relevant construction standards.*

### **~ Construction and Fitout Requirements**

Food handling and storage areas must be constructed and fitted out in accordance with:

- AS 4674-2004 - Construction and fit out of food premises
- AS/NZS 1668.2-2012 - The use of ventilation and air-conditioning in buildings - mechanical ventilation in buildings

*Reason: To ensure safe and hygienic food preparation/storage and compliance with Food Act 2003 and Regulations 2015, Food Standards Code and relevant Australian Standards.*

### **~ Identification Signage**

The proposed signage shall:

- Be wholly located within the property;
- Include operating hours for any proposed illumination. Any lighting must not operate after 7pm if adjoining residential dwellings; and,
- Not use materials that produce unreasonable amounts of glare.

*Reason: Signs do not interfere with public safety.*

### **~ Continuous Maintenance of Signs**

The sign/s approved by this consent must be continuously maintained in a structurally sound and tidy manner.

*Reason: To ensure that signs do not become derelict or unsightly.*

### **~ Lighting In Car Parks and Public Spaces**

Lighting throughout the car parking area and in public spaces must comply with AS 2890.1:2004 - Parking Facilities - Off-Street Car Parking and AS 1158 - Lighting for Roads and Public Spaces.

*Reason: To ensure the provision of adequate lighting within the development.*

### **~ Maintain Car Parking Areas and Driveway Seals**

All sealed car parking areas, loading bays, manoeuvring areas and driveways must be maintained in a trafficable condition, including line/pavement marking.

*Reason: To ensure car park areas are useable.*

### **~ Car Parking Spaces to Be Kept Free At All Times**

All car parking spaces, loading and unloading areas, vehicle manoeuvring and driveway areas must not be used for the storage of any goods or materials and must be available for their intended use at all times. The operator of the development must ensure that all vehicles associated with the development are parked within the site in the approved car parking area as line marked.

*Reason: To ensure such areas are available for occupants and visitors of the site and parking on site is used for the development.*

### **~ Fire Safety Certificate**

Prior to obtaining the final occupation certificate, provide the final fire safety certificate to Queanbeyan-Palerang Regional Council (and to the principal certifying authority if not Queanbeyan-Palerang Regional Council). A final fire safety certificate is a certificate issued by or on behalf of the owner of the premises to the effect that each essential fire safety measure specified in the current fire safety schedule for the building to which the certificate relates:

- a) has been assessed by a properly qualified person, and
- b) was found, when it was assessed, to be capable of performing to at least the standard required by the current fire safety schedule for the building for which the certificate is issued.

**Note:** The assessment of essential fire safety measures must have been carried out within the period of 3 months prior to the date on which a final fire safety certificate is issued

As soon as practicable after the final fire safety certificate is issued, the owner of the building to which it relates:

- a) must provide a copy of the certificate (together with a copy of the current fire safety schedule) to the Fire Commissioner, and
- b) must display a copy of the certificate (together with a copy of the current fire safety schedule) prominently displayed in the building.

*Reason: To ensure compliance with the Environmental Planning and Assessment Regulation 2000.*

### **~ Submit Annual Fire Safety Statement**

Each year, the owner of the building must submit to Council an Annual Fire Safety Statement for the building. The Annual Fire Safety Statement must address each Essential Fire Safety Measure in the building.

*Reason: To ensure compliance with the Environmental Planning and Assessment Regulation 2000.*

### **~ Insulate Heated and Cold Water Service Pipes**

Heated and cold water service pipes installed in the following areas of the building must be insulated in accordance with the requirements of AS 3500: Plumbing and Drainage:

- a) unheated roof spaces
- b) locations near windows, ventilators and external doors where cold draughts are likely to occur
- c) locations in contact with cold surfaces such as metal roof and external metal cladding materials.

*Reason: To prevent the water service being damaged by water freezing within the pipes due to local climatic conditions.*



### **~ Plumbing and Drainage Installation Regulations**

Plumbing and drainage work must be carried out in accordance with the requirements of the Local Government (General) Regulation 2005, the Plumbing and Drainage Act 2011 and Regulations under that Act and with the Plumbing Code of Australia. Such work must be carried out by a person licensed by the NSW Department of Fair Trading.

*Reason: This is a mandatory condition under the provisions of the Local Government (General) Regulation 2005.*

### **~ Inspection of Plumbing and Drainage**

Plumbing and Drainage must be inspected by Council (the relevant Water and Sewer Authority) at the relevant stages of construction in accordance with Council's inspection schedule.

*Reason: To ensure compliance with the inspection requirements of Plumbing and Drainage Regulation 2012 and Council's inspection schedule.*

### **~ Floor Level to Be 150mm Above Yard Gully**

The floor level of areas with fixtures connected to sewer must be at least 150mm above overflow level of the yard gully and surface water must be prevented from entering the yard gully.

*Reason: To ensure any sewage surcharges occur outside the building and to prevent surface water from entering the sewerage system.*

### **~ Heated Water Not To Exceed 50 Degrees C**

All new heated water installations, must deliver hot water at the outlet of all sanitary fixtures used primarily for personal hygiene purposes at a temperature not exceeding 50° Celsius.

All heated water installation for any accessible facility must deliver hot water at a temperature not exceeding 45° Celsius.

*Reason: To prevent accidental scalding.*